

UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT
OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	
	:	
ISAIAH LUTHER MERCER,	:	
a/k/a "LOVEY"	:	CRIMINAL NO. 03-19- Erie,

MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS

AND NOW, comes the defendant, Isaiah Luther Mercer, by and through his attorney, Gene P. Placidi, Esquire, and files the following Motion for Extension of Time to File Pre-Trial Motions, averring in support thereof as follows:

1. The defendant is charged by federal indictment at the above term and number With one (1) count of Possession With Intent to Distribute 50 grams or More of Cocaine Base, a Scheduled II Controlled Substance.
2. The defendant was granted an Extension of time by this Honorable Court to file any and all pre-trial motions. Defendant's pre-trial motions are due on or before December 29, 2005.
3. The undersigned is in need of additional time to file pre-trial motions on behalf of the defendant.
4. Consequently, the undersigned respectfully request that the Court grant him an additional sixty (60) days to file any pre-trial motions on behalf of the defendant.
5. In addition, the Defendant and Government are in plea negotiations regarding this matter.

6. Christian Trabold, Assistant U.S. Attorney, hereby consents to the Extension of time.

WHEREFORE, the undersigned respectfully requests that the Court Enter an Order granting him an additional Sixty (60) days to file any and all pre-trial motions on behalf of the defendant, Isaiah Luther Mercer, regarding the above captioned matter.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Gene P. Placidi". The signature is fluid and cursive, written over a horizontal line.

Gene P. Placidi, Esq.
502 West 7th Street
Erie, Pennsylvania 16502
814-459-5557
814-453-6778

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v. :

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CRIMINAL NO. 03-19- Erie,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of defendant's
Motion for Extension of time to File Pre-Trial Motions was served upon the following,

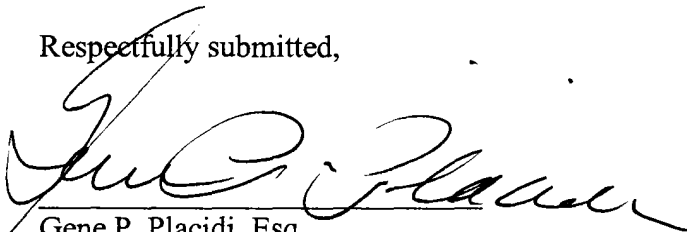
by hand delivery or first class united States Mail, on the 23rd day of

December, 2005, to the party listed below.

Christian A. Trabold
Assistant U.S. Attorney
Federal Courthouse
Room A 330
17 South Park Row
Erie, Pennsylvania 16501-1158

Respectfully submitted,

By:


Gene P. Placidi, Esq.